

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**NEUROSURGICAL CARE, LLC**

**Plaintiff,**

**v.**

**BIEGLER GMBH; SOLACE  
ADVANCEMENT, LLC; JAMES W.  
CARPENTER; and DOC SOLUTIONS  
LLC,**

**Defendants.**

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**Case No. 2:19-cv-05751-JMY**

**STIPULATION**

It is hereby STIPULATED and AGREED by and between the undersigned counsel for Plaintiff Neurosurgical Care, LLC, and Defendants, Solace Advancement, LLC, James W. Carpenter, pursuant to [Fed. R. Civ. P. 6\(b\)](#) and Local Rule 7.4(b)(2), that the time for Plaintiff to respond to Defendants Solace Advancement, LLC and James W. Carpenter's Motion to Dismiss ([ECF No. 99](#)) be stayed until thirty (30) days after the United States Judicial Panel on Multidistrict Litigation rules on Plaintiff's Motion for Transfer and Coordination or Consolidation under [28 U.S.C. §1407](#) to the District of Arizona in MDL No. 3054, or a date otherwise set by the Court thereafter.

**IT IS SO STIPULATED AND AGREED**

/s/ Simon Bahne Paris

Simon Bahne Paris, Esq.

**Saltz Mongeluzzi & Bendesky, P.C.**

1650 Market Street, 52nd Floor

Philadelphia, PA 19103

*Attorneys for Plaintiff, Neurosurgical  
Care, LLC*

Dated: October 26, 2022

/s/ Jeffrey A. Lutsky

Jeffrey A. Lutsky, Esq.

Melissa Lynn Perry, Esq.

William E. Mahoney, Jr., Esq.

**Stadley Ronon Stevens & Young LLP**

2600 One Commerce Sq.

Philadelphia, Pa 19103

*Counsel for Defendants*

*Solace Advancement, LLC*

*James W. Carpenter*

Dated: October 26, 2022

IT IS SO ORDERED:

/s/ John Milton Younge

Judge John Milton Younge

Dated: October 27, 2022